PAGE

02/04 255626

RNER PADGET TURNER PADGET GRAHAM & LANEY PA.

CHARLESTON COLUMBIA FLORENCE GREENVILLE MYRTLE BEACH

JEFFREY T. STOVER

REPLY TO:

E-Mail: jstover@turnerpadget.com Writer's Direct Dial: (843) 576-2827 Direct Fax: (843) 577-1656

March 10, 2015

VIA CERTIFIED MAIL AND FAX

Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210 Fax:803-896-5199

Re:

Dao Travels, LLC v. Charleston Black Cab Company and Sam Mustafa

Case No.: 2:14-cv-01967-PMD Our File No.: 13362,101

Dear Sir or Madam:

This law firm represents Charleston Black Cab Company in connection with the enclosed Complaint. Please direct all correspondence regarding this matter to the undersigned.

Sincerely,

TURNER, PADGET, GRAHAM & LANEY, P.A.

JTS/adh Enclosure

çç: Christopher Inglese, Esq. MAR I ZOIS
CLERK'S CSC SC

Public Service Commission of South Carolina 101 Executive Center Dr., Suite 100 Columbia, SC 29210



Phone: 803-896-5100 Fax: 803-896-5199 www.psc.sc.gov

Individual Complaint Form

SC 20404	Date: March 9,			viduai Comp	laint Form			
Name * Sam Musiafa Firm (if eppicable) Charleston Black Cab Company Address * 40 Calhour Street, Suite 200 City, State Zip * 40 Calhour Street, Suite 200 City, State Zip * Charleston Black Cab Company Name of Utility Involved in Complaint: * Dao Travels, LLC NOTIE: If ATAT is the utility involved, please complete the attachment located at the end of this form. Ype of Complaint (check appropriate box below.) * Billing Error/Adjustments Deposits and Credit Establishment Wrong Rare Refusal to Connect Service Bywent Arrangements Deposits and Credit Establishment Warer Quality Line Extension Issue Service Issue Meter	Complainant or	Legal Repre	esentative Informat	ion: * :	Zaguland min			
Malling Address * 40 Cathoun Street, Suite 200 City, State Zip * Charleston* SC 29401 Phone * 843-412-6148 E-mail * Sam@charlestonhospitalitygroup.com Name of Utility Involved in Complaint: * Dao Travels, LLC NOTE: If AT&T is the utility involved, please complete the amachment located at the end of this form. NoTE: If AT&T is the utility involved, please complete the amachment located at the end of this form.	Name *				cedaired kields			
Malling Address * 40 Cathoun Street, Suite 200 City, State Zip * Charleston* SC 29401 Phone * 843-412-6148 E-mail * Sam@charlestonhospitalitygroup.com Name of Utility Involved in Complaint: * Dao Travels, LLC NOTE: If AT&T is the utility involved, please complete the amachment located at the end of this form. NoTE: If AT&T is the utility involved, please complete the amachment located at the end of this form.	Firm (if applicable)	Charleston Black Cab Company						
Semail Sam@charlestonhospitalitygroup.com SC 29401 Phone 843-412-6148	Mailing Address *	40 Calhoun Street, Suite 200						
Sam@charlestonhospitalitygroup.com Name of Utility Involved in Complaint: * Dao Travels, LLC NOTE: If AT&T is the utility involved, please complete the attachment located at the end of this form. Special Complaint (check appropriate box below,) *	City, State Zip *	Charleston SC 20404						
NOTE: If AT&T is the utility involved, please complete the attachment located at the end of this form. NOTE: If AT&T is the utility involved, please complete the attachment located at the end of this form.	E-mail *	sam@charle			Phone *	843-412-614	16	
ype of Complaint (check appropriate box below.) * Billing Error/Adjustments	Name of Utility I	nvolved in C	Ompleint: * D *					
Disconnection of Service Deposits and Credit Establishment Wrong Rate Refusal to Connect Service Disconnection of Service Payment Arrangements Water Quality Line Extension Issue Service Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY"		TOC 1 13 THE DELL	ity involved alarge					
Disconnection of Service Payment Arrangements Water Quality Line Extension Issue Service Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY" Water Quality Line Extension Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY" Water Quality Line Extension Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY" Water Quality Line Extension Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY" Water Quality Line Extension Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY" Water Quality Line Extension Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY" Water Quality Line Extension Issue Improper use of trade name "CHARLESTON BLACK CAB COMPANY" Water Quality Line Extension Issue Line Extension Issue Line Extension Issue Line Extension Issue Water Quality Line Extension Issue Line Extension Issue Line Extension Issue Line Extension Issue Water Quality Line Extension Issue Line Extension Issue Line Extension Issue Line Extension Issue Water Quality Line Extension Issue Line Extension Issue Line Extension Issue Line Extension Issue Water Quality Line Extension Issue	Type of Complain	it (check appr	ropriate box below.) *	inplete the attachn	ent located at the	end of this form		
Part Statement of Facts/Complaint: * (This section must be completed. Attach additional information to this page if necessary.) Charleston Black Cab Company ("CBCC") is a certificated motor carrier in the State of South Carollina. CBCC is authorized to cocket No. 2013-220-T. PSC Order No. 2013-219-T. Order No. 2013-416, PSC/ORS Cert. No. 8803) and as a tax! (PSC der the trade name "CHARLESTON BLACK CAB CO." Pact Travels, LLC ("DAC") is a certificated motor carrier in the State of South Carollina. DAO is authorized to operate on a complete contract of the state of South Carollina. DAO is authorized to operate on a complete contract of the state of South Carollina. DAO is authorized to operate on a complete contract of the state of South Carollina. DAO is authorized to operate on a complete contract of the state of South Carollina. DAO is authorized to operate on a complete under the trade name "An Executive Travel." Do nor about January 23, 2015, DAO entered an agreement (the "Assignment") with Yellow Cab Company of Charleston of Charleston purported to assign to DAO the right to use the trade name ("Yellow Cab Company of Charleston purported to assign to DAO the right to use the trade name ("Yellow Cab Company by way of an agreement (the "Agreement") between the two. Both the Assignment and the Agreement purport to hear the Assignment nor the Agreement was authorized by the Public Service Commission as required by S.C. Code point of the state of South Carollina authorized to operate under the harden of the Assignment of the Agreement was authorized motor carrier in the state of South Carollina authorized to operate under the name ("CHARLESTON BLACK CAB COMPANY") and the state of South Carollina authorized to operate under the name "CHARLESTON BLACK CAB COMPANY" into a particulation no. 103-153. The stated reason for the assat S	☐ Disconnection of Service Issue ☐ Other (be specific	f Service c) Improper	Payment Arranger Meter Issue use of trade name	ments CHARLESTON I	Water Qua	lity	Refusal to Connect Service Line Extension Issue	
Charleston Black Cab Company ("CBCC") is a certificated motor carrier in the State of South Carolina. CBCC is authorized to concern the trade name "CHARLESTON BLACK CAB COMPANY." In the "Agreement to which "Yellow Cab Company by Way of an agreement (the "Agreement") between the two. Both the Assignment and the Agreement was authorized motor carrier in the State of South Carolina. CBCC is authorized to carrier the way of an agreement was authorized to carrier to said the said manner to the Agreement was authorized motor carrier in the State of South Carolina. DAO is authorized to operate on a operate under the trade name "CHARLESTON BLACK CAB CO." To rabout January 23, 2015, DAO entered an agreement (the "Assignment") with Yellow Cab Company of Charleston ("Yellow Information and belief, Yellow Cab Company of Charleston purported to assign to DAO the right to use the trade name (the "Agreement") between the two. Both the Assignment and the Agreement purport to hear the Assignment and the Agreement was authorized by the Public Service Commission. Son 13-135. Don information and belief, Yellow Cab is a certificated motor carrier, which is a right provided by the Public Service Commission. Son 13-135. Don information and belief, Yellow Cab is a certificated motor carrier in the state of South Carolina authorized to operate under the name ("HARLESTON BLACK CAB COMPANY"). American Black Cab Company was a certificated motor carrier, which is a right provided by the Public Service Commission as required by S.C. Code on the carolina authorized to operate under the name ("HARLESTON BLACK CAB COMPANY"). American Black Cab Company was a certificated motor carrier in the state of South Carolina authorized to operate under the name "CHARLESTON BLACK CAB COMPANY". American Black Cab Company was a certificated motor on about February 20, 2015, DAO applied for an exemption from Regulation No. 103-153. The stated reason for the assat Sedans should be allowed to not have markings and identification pursuant to Regulation 103-1	lave you contacted	the Office of I	Regulatory Staff (DD)	10 + KZ++	Name	MPANY		
Charlestatement of Facts/Complaint: * (This section must be completed. Attach additional information to this page if necessary.) Charleston Black Cab Company ("CBCC") is a certificated motor carrier in the State of South Carolina. CBCC is authorized to cicket No. 2013-220-T, PSC Order No. 2013-219-T, Order No. 2013-416, PSC/ORS Cert. No. 8803) and as a taxl (PSC obeket No. 2013-2414, PSC/ORS Cert. No. 8791). CBCC's certificates provide that it will operate Dao Travels, LLC ("DAC") is a certificated motor carrier in the State of South Carolina. DAO is authorized to operate on a operate under the trade name "An Executive Travel." On or about January 23, 2015, DAO entered an agreement (the "Assignment") with Yellow Cab Company of Charleston ("Yellow On or about January 23, 2015, DAO entered an agreement (the "Assignment") with Yellow Cab Company of Charleston ("Yellow Cab Company of Charleston purported to assign to DAO the right to use the trade name ("Yellow Cab Company of Charleston purported to assign to DAO the right to use the trade name plop information and belief, Yellow Cab claims that it obtained the right to operate under the trade name from American Black orize the use of a trade name by a certificated motor carrier, which is a right provided by the Public Service Commission as required by S.C. Code on information and belief, Yellow Cab is a certificated motor carrier in the state of South Carolina authorized to operate under the trade name of the Agreement was authorized by the Public Service Commission as required by S.C. Code on information and belief, Yellow Cab is a certificated motor carrier in the state of South Carolina authorized to operate under the name "CHARLESTON BLACK CAB COMPANY." American Black Cab Company was a certificated motor or open information and belief, Yellow Cab is a certificated motor carrier in the state of South Carolina authorized to operate under the name "CHARLESTON BLACK CAB COMPANY." On open the name "CHARLESTON BLACK CAB COMPANY." If these consumers corrier to the					Una Lan	tect: Down Li	n	
cocket No. 2013-220-T, PSC Order No. 2013-219-T, Order No. 2013-415, PSC/ORS Cerf. No. 8803) and as a taxl (PSC det the trade name "CHARLESTON BLACK CAB CO." January Color of the trade name "CHARLESTON BLACK CAB CO." January Color of the trade name "CHARLESTON BLACK CAB CO." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name from American Black of the trade name from American Black of the Assignment nor the Agreement (the "Agreement") between the two. Both the Assignment and the Agreement purpor to have the Assignment nor the Agreement was authorized by the Public Service Commission as required by S.C. Code on information and belief, Yellow Cab is a certificated motor carrier in the state of South Carolina authorized to operate under the name "CHARLESTON BLACK CAB COMPANY." American Black Cab Company was a certificated motor on or about February 20, 2015, DAO applied for an exemption from Regulation No. 103-153. The stated reason for the assat Sedans should be allowed to not have markings and identification pursuant to Regulation 103-153." See Docket No. 1015-101. The stated reason for the assat Sedans	oncise Statement	of Facts/Cor	nplaint: * (This sort	On must be				
cocket No. 2013-220-T, PSC Order No. 2013-219-T, Order No. 2013-415, PSC/ORS Cerf. No. 8803) and as a taxl (PSC det the trade name "CHARLESTON BLACK CAB CO." January Color of the trade name "CHARLESTON BLACK CAB CO." January Color of the trade name "CHARLESTON BLACK CAB CO." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name "An Executive Travel." January Color of the trade name from American Black of the trade name from American Black of the Assignment nor the Agreement (the "Agreement") between the two. Both the Assignment and the Agreement purpor to have the Assignment nor the Agreement was authorized by the Public Service Commission as required by S.C. Code on information and belief, Yellow Cab is a certificated motor carrier in the state of South Carolina authorized to operate under the name "CHARLESTON BLACK CAB COMPANY." American Black Cab Company was a certificated motor on or about February 20, 2015, DAO applied for an exemption from Regulation No. 103-153. The stated reason for the assat Sedans should be allowed to not have markings and identification pursuant to Regulation 103-153." See Docket No. 1015-101. The stated reason for the assat Sedans	Charleston Black	Cab Compar	y ("CBCC") is a cert	ficated motor -	Ted. Anach additi	onal information	to this page if necessary.)	
ANY," in every way, including the webpage www.charlestonblackcabcompany.com.	ab") pursuant to whe HARLESTON BLA Upon information a b Company by way there is the use of a sither the Assignment of the Information and Information and Information at the State of Sither in the State of the Information was as folious ating under the transput of the senting of the senting of the senting of the senting of the Information Informati	nich Yellow Ca CK CAB COM and belief, Yell y of an agreer trade name I trade name I at the nor the Agr 35. Ind belief, Yell than "CHARL South Carolina by 20, 2015, D ws: "In order build be allowed 255184. Ho de name "CH Regulation Nonsibility can trade name "	de Company of Charles and Company of Charles (the "Agreement by a certificated motorement was authorized to operated to not have marking to not have marking to not have marking to 103-131 provides to definitely fixed. ("CHARLESTON BLACK"	eement (the "Assileston purported it obtained the ript") between the or carrier, which zed by the Public ted motor carrier B COMPANY." Alste under the native emption from Rivel to fairly company of that two certifics consumers are concerned.	ght to operate up two. Both the Assign to DAG assign to DAG and the Assign to DAG and the Assign to operate up two. Both the Assign the state of SAmerican Black on "CHARLEST egulation No. 100 and the "pressition pursuant to DAO requested to open up to DAO and	rellow Cab Con O the right to us of the relief becaused the right to us of the relief becaused the right to us of the relief becaused the right to us of the right to	mpany of Charleston ("Yellow se the trade name name from American Black the Agreement purport to a Service Commission." The description of the service to operate under was a certificated motor as COMPANY." The description of the service transportation market, 3-153." See Docket No. are it has actually been of the Assignment. Operate under the same ad upon DAO's	
rius: oe completed. Attach additional information to this page if necessary.)	PANY," in every wa	ay, including t	the webpage www.ch	to stop operating Parlestonblackca	under the trade bcompany.com.	name "CHARI	e appropriate party. LESTON BLACK CAB	
		- Sweet Hills	ve completed. Attach	additional informs	tion to this page i	f necessary.)		

Sto	Dao Travels 11 C to
-	Dao Travels, LLC from using the trade name "CHARLESTON BLACK CAB COMPANY."
- 1	DAOR CAB COMPANY."
1	
AAT	
ITS	THE PUBLIC SERVICE COMMISSION OF SOUTH
SUB	T. T.O. BY THE COMMISSION'S WERSITE CHARLES AROLINA PERMISSION TO PUBLISH THE
1	THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA PERMISSION TO PUBLISH THIS COMPLAINT AND NTENTS ON THE COMMISSION'S WEBSITE (dms.psc.sc.gov), AND I UNDERSTAND SUCH INFORMATION MAY BE
L	TO A MAY BE
COU	OF SOUTH CAROLINA SALLINGS
COO	Y OF VERIFICATION Completent's Signature* (MUST BE SIGNED, DO NOT PRINT)
l	Sam Mustafa
-,	Complainant's Name + verify that I have read my complain
	internal Lie Columnia (1900)
and kno	the contents thereof, and that said contents are true. Date * Date *
	Complainant's Signature * (MUST BE SIGNED, DO NOT PRINT)